






SUPPLIERS PRIVACY POLICY PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 2016/679 (GENERAL DATA PROTECTION REGULATION – "GDPR")




	IDENTITY OF THE DATA CONTROLLER	MUNDYS SpA (hereinafter " Mundys " or " Data Controller "), with its registered office at Piazza San Silvestro 8, 00187 Rome			
	DATA CONTROLLER'S CONTACT DATA	<ul style="list-style-type: none"> Email: privacy@mundys.com Address: Piazza San Silvestro 8, 00187 Rome. 			
	PERSONAL DATA COLLECTED	<ul style="list-style-type: none"> Identification and/or contact data (e.g. name, surname, sex, place and date of birth, tax code, VAT number for self-employed individuals/sole traders, identity documents, telephone number/mobile phone number, email address. Address of residence, address of domicile and similar); Economic / financial / tax data (e.g. IBAN, payslip, credit card number, data relating to the transfer of income, advance payments – IRPEF, advance payments – TFR, CUD, tax returns and similar documents, debts/credits/insolvencies and similar data, active and passive billing data); Special Categories of Personal Data (e.g. health data present in the CTU, which may have been considered in compensation proceedings); Judicial data (e.g. Self-declaration of due diligence); Data relating to professional life (e.g., professional role, educational qualifications and details relating to enrolment in training courses/universities/schools/certifications, registration in professional registers and similar). 			
	PURPOSE OF PROCESSING		LEGAL BASIS OF PROCESSING		PERSONAL DATA STORAGE TIMES
1.	Fulfill pre-contractual obligations (e.g., participation in tenders, competitive procedures such as "beauty contests," supplier portal registration) and preliminary verification activities prior to registration in the supplier register (e.g., verifying the self-declaration of due diligence).	Pre-contractual measures			<p>Personal data are retained for the period necessary to achieve the purposes for which they were collected, in compliance with the principle of data minimization and, in any case:</p> <ul style="list-style-type: none"> no longer than twelve (12) months from the date of receipt/collection; twenty-four (24) months from the date of receipt/collection or from the conclusion of the preliminary verification process in case of non-

			registration to the register."
2.	Fulfill contractual obligations (administrative, accounting, tax and fiscal activities related thereto, e.g., treasury compliance, management of active and passive invoicing, and general accounting).	Contract implementation	Ten (10) years starting from the date of termination of the contractual relationship or the last registration (cf. art. 2220 of the Civil Code and Presidential Decree no. 600/1973, Art. 43) for fiscal activities.
3.	Comply with the legal, regulatory, and fiscal obligations provided for in the procurement procedures for goods, services, and works.	Legal obligation	Ten (10) years starting from the date of termination of the contractual relationship, also in compliance with any legal obligations provided for by civil, fiscal, and regulatory provisions, etc.
4.	Management of documentation required from suppliers during the DUVRI drafting phase	Contract implementation / pre-contractual measures Legal obligation Legitimate interest	Ten (10) years from the conclusion of the assignment process, also in compliance with any legal obligations provided for by civil, fiscal and regulatory provisions, etc.
5.	Management of activities relating to the administration and enhancement of real estate properties (with particular reference to the management of mandates conferred on freelancers or consulting firms).		
6.	Manage access to company premises in order to guarantee the safety and protection of individuals accessing the company premises, safeguard the company's assets, and prevent any unlawful acts	Legitimate interest	Data will be retained for six (6) months from the date of collection/access to the company premises.
7.	Management of civil (including insurance), criminal and corporate litigation.	Legitimate interest	Five (5) years from the resolution of the dispute (e.g. negotiation) and/or from the final judgement or its enforcement.
8.	Manage the IT infrastructure, company devices and applications, IT resources, and their monitoring data (e.g., system updates and maintenance, log management, access	Contract implementation / pre-contractual measures Legitimate interest	<ul style="list-style-type: none"> • Personal data: ten (10) years from the date of termination of the contractual relationship; • Monitoring data: twelve (12) months from the end of the employment or

Mundys SpA

Registered Office, Piazza di San Silvestro 8, 00187 ROME; Management and Administrative Offices, Piazza A. Diaz 2, 20123 MILAN. Capitale Sociale € 825.783.990,00 i.v., Codice Fiscale, P. IVA e iscrizione al Registro delle Imprese di Roma n. 03731380261 Iscrizione al R.E.A. n. 1023691.
mundys@pec.mundys.it www.mundys.com Tel. 02.78.62.50.40





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	<p>recording, company e-mail account, etc.) in compliance with current regulations (with special regard to remote monitoring) and the assigned company assets.</p>		<p>supply relationship in the case of external parties;</p> <ul style="list-style-type: none"> E-mail account data: deleted within ninety (90) days from account closure from the date of termination of the employment or supply relationship in the case of external parties; Logical access logs: retained for a period of one hundred and eighty (180) days.
<p>The retention time may be extended in the event of legal or disciplinary action and to enforce Mundys' rights. In such event, your personal data will be retained for the duration of the proceedings, until they are concluded and all time limits for appeals have expired.</p>			
	<p>HOW DATA IS PROCESSED AND SECURITY MEASURES</p>	<p>Data may be processed by technological and/or paper methods and through suitable IT tools (e.g., software, hardware, applications, etc.). In this regard, Mundys has controls and procedures in place to ensure the confidentiality of your data, and is constantly committed to adopting, pursuant to art. 32 of the GDPR, specific technological and organisational measures to protect data against the risk of loss, unlawful or incorrect use and unauthorised access.</p>	
	<p>RECIPIENTS AND CATEGORIES OF RECIPIENT OF PERSONAL DATA</p>	<p>In order to pursue the stated purposes of processing, personal data may be transferred to various entities, including:</p> <ul style="list-style-type: none"> the Data Controller's employees and collaborators, in their capacity as authorised data processors; third parties contractually linked to the Data Controller, who in certain cases will act as data processors (e.g., information service providers, SAP, Ariba, etc.) or autonomous data controllers; judicial authorities and/or public bodies, at their express request and/or under the law, during investigations and checks in their capacity as autonomous data controllers. <p>A full list of recipients of Data Subjects' Personal Data, including further details on the location of such recipients, is kept at the Data Controller's head office and may be consulted on request.</p>	
	<p>TRANSFER OF PERSONAL DATA</p>	<p>Your personal data will essentially be processed within the European Union. In the event that it is necessary to transfer your data to third parties located outside the European Economic Area (EEA) for specific processing management purposes, such transfer will only take place where the European Commission has confirmed an appropriate level of data protection in the third country or where there are adequate data protection safeguards in place (e.g., EU standard contractual clauses for the transfer of data to third countries).</p>	

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	<p>DATA SUBJECT RIGHTS</p>	<p>With regard to the Data Controller, Data Subjects may at any time exercise their rights as provided for in Articles 15 <i>et seq.</i> of the GDPR, in relation to the processing of their personal data, such as, for example, right of access, correction, deletion, restriction of and opposition to processing by sending an email request to privacy@mundys.com.</p>
	<p>RIGHT TO LODGE A COMPLAINT WITH THE DATA PROTECTION AUTHORITY</p>	<p>If you believe that your personal data have been processed unlawfully, you have the right to lodge a complaint with the Italian Data Protection Authority (https://www.garanteprivacy.it/).</p>
	<p>PROVISION OF PERSONAL DATA</p>	<p>With regard to the purposes of processing, the provision of data is obligatory. If you do not provide data, it will be impossible to establish or continue a contract.</p>
	<p>AUTOMATED DECISION-MAKING PROCESS</p>	<p>Personal data collected will not be subject to an automated decision-making process.</p>